

DAVID T. MALOOF (DM 3350)
THOMAS M. EAGAN (TE 1713)
MALOOF BROWNE & EAGAN LLC
411 Theodore Fremd Avenue, Suite 190
Rye, New York 10580-1411
(914) 921-1200
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
SOMPO JAPAN INSURANCE COMPANY OF :
AMERICA and SOMPO JAPAN INSURANCE, :
INC. :

07 Civ. 2735 (DC)

Plaintiffs,

- against -

:
: **DECLARATION**
: **OF AKIKO HOOVER**

NORFOLK SOUTHERN RAILWAY COMPANY, :
NORFOLK SOUTHERN CORPORATION and :
THE KANSAS CITY RAILWAY COMPANY ;

Defendants.
----- X

Akiko Hoover, declares:

1. A space was left in my deposition transcript at page 50 regarding whether any salvage was received by Unisia of Georgia for the autoparts damaged in the train wreck.
2. I have made investigation and find no record of Unisia receiving salvage for the particular autoparts damaged.
3. Moreover, if any salvage had been obtained, it would have been *de minimis*. I estimate any salvage would have been a maximum of \$3,503.09 based on the weight of the parts which were metal and scrap prices. (My calculations are attached as Exhibit A.)

I declare the foregoing is true under the penalty of perjury under the laws of the United States.

EXHIBIT 32

Monroe, Georgia
February 25, 2009



Akiko Hoover

Part	P/N	QTY	Weight/pc(kg)	Total weight (KG)	Total weight (LB)	Salvage value (per LB)	Total Salvage Value
HOUSING SUB ASSY RHLH	C13S1080001	3,450	0.703	2425.35	5345.47	\$0.49	\$2,619.28
VTC Assy	B1302542501	7,530	1.42	10692.6	23,566.49	\$0.03	\$706.99
Solenoid assy	A23796E.A000	No salvage value due to the plastic material inside the metal product					0
Valve assy purge	WA83000B10	No salvage value due to the plastic material inside the metal product					0
Vane	C13C1670033	7,200	0.365	2,628	5,792.11	\$0.03	\$173.76
BOLT W/WASHER	C13S1180001	3,600	0.006	21.6	47.61	\$0.03	\$1.43
PIN-LOCK VTC	C13C1760014	1,500	0.00466	6.99	15.41	\$0.03	\$0.46
PLATE-SOL VALVE	A83121000	2,500	0.007	17.5	38.57	\$0.03	\$1.16
DAMPER PAPER	W3721235G00	No salvage value due to the parts made of non-metal parts					
SEAL OIL BRG RACE	37134P0700						0
SPR-SEAL VTC	C13C1750000						0
RETAINER-VTC	C13C1890003						0
FILTER	C13S1160001						0
Total salvage value							\$3,503.09

EXHIBIT A
TO HOOVER DECLARATION